STATE OF SOUTH CAROLINA

(Caption of Case)

Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2009 - 141 - T

(Please type or print)


Submitted by: John J. Pringle, Jr
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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☒ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

| INDUSTRY (Check one) | NATURE OF ACTION (Check all that apply) | | |
|---|---|---|---|
| ☐ Electric | ☐ Affidavit | ☒ Letter | ☒ Request |
| ☐ Electric/Gas | ☐ Agreement | ☐ Memorandum | ☐ Request for Certificatio |
| ☐ Electric/Telecommunications | ☐ Answer | ☐ Motion | ☐ Request for Investigation |
| ☐ Electric/Water | ☐ Appellate Review | ☐ Objection | ☐ Resale Agreement |
| ☐ Electric/Water/Telecom. | ☐ Application | ☐ Petition | ☐ Resale Amendment |
| ☐ Electric/Water/Sewer | ☐ Brief | ☐ Petition for Reconsideration | ☐ Reservation Letter |
| ☐ Gas | ☐ Certificate | ☐ Petition for Rulemaking | ☐ Response |
| ☐ Railroad | ☐ Comments | ☐ Petition for Rule to Show Cause | ☐ Response to Discovery |
| ☐ Sewer | ☐ Complaint | ☐ Petition to Intervene | ☐ Return to Petition |
| ☐ Telecommunications | ☐ Consent Order | ☐ Petition to Intervene Out of Time | ☐ Stipulation |
| ☒ Transportation | ☐ Discovery | ☐ Prefiled Testimony | ☐ Subpoena |
| ☐ Water | ☐ Exhibit | ☐ Promotion | ☐ Tariff |
| ☐ Water/Sewer | ☐ Expedited Consideration | ☐ Proposed Order | ☐ Other: |
| ☐ Administrative Matter | ☐ Interconnection Agreement | ☐ Protest | |
| ☐ Other: | ☐ Interconnection Amendment | ☐ Publisher's Affidavit | |
| | ☐ Late-Filed Exhibit | ☐ Report | |

# ELLIS : LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com

September 16, 2009

**FILED ELECTRONICALLY**
The Honorable Charles L.A. Terreni
Chief Clerk
**South Carolina Public Service Commission**
PO Drawer 11649
Columbia SC 29211

RE: Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier
**Docket No. 2009-141-T, Our File No. 2054-11673**

Dear Mr. Terreni:

On behalf of U-Haul Co. of South Carolina, Incorporated, ("U-Haul") or ("Applicant"), and pursuant to Commission Rule 103-852, I request that the Commission grant U-Haul leave to take the deposition of one or more witnesses chosen by the Applicant in the above-referenced Docket. This witness (or these witnesses) will testify as U-Haul's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing this witness (or these witnesses) to testify via deposition will accommodate his or her (or their) very busy schedules.

The facts that U-Haul seeks to establish by this deposition are those that support U-Haul's application in this Docket: that there is statewide demand for household goods moving services that is not current being met.

The deposition(s) will take place via telephone or otherwise, at the offices of Ellis, Lawhorne & Sims, P.A., 1501 Main Street, 5th Floor, Columbia, South Carolina 29201.

By copy of this letter, I am serving all parties of record in this proceeding and enclose my Certificate of Service to that effect.

With kind regards, I am

Yours truly,

John J. Pringle, Jr.

cc: Jeffrey M. Nelson, Esquire (via electronic mail service)
Mr. Thomas Tollison (via electronic mail service)
All parties of record (via U.S. mail service)

**BEFORE**
**THE PUBLIC SERVICE COMMISSION OF**
**SOUTH CAROLINA**
**DOCKET NO. 2009-141-T**

| | | |
|---|---|---|
| Application of U-Haul Co. of South Carolina, Incorporated for a Class E (Household Goods) Certificate of Public Convenience and Necessity for the Operation of a Motor Vehicle Carrier | ) | **CERTIFICATE OF SERVICE** |

This is to certify that I have caused to be served this day, one (1) copy of the **Request for Leave to Take Deposition** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

**VIA ELECTRONIC MAIL SERVICE**

Jeffrey Nelson, Esquire
Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211

Mr. Tom Roth
Atlantic Transfer and Storage Company, Incorporated
7370 E. Spartan Boulevard
Charleston, SC, 29418

Mr. Albert H. Kohler
Kohler Moving and Storage, Incorporated
1159 Cainhoy Road
Wando, SC, 29492

Mr. Tim White
Reads Moving Systems of Carolina
1072 Dropoff Drive
Summerville, SC, 29483

Mr. Trey Ingram
Trega, LLC d/b/a Apartment Movers, Etc.
2908-B Maybank Highway
Johns Island, SC, 29455

Carol Roof
Paralegal

September 16, 2009
Columbia, South Carolina